

2. *Court:* _____

(If federal court, name the district; if state court, name the county)

3. Docket Number: _____

4. Name(s) of Judge(s) to whom case was assigned: _____

5. Status of Case: _____

(For example, was the case dismissed? Settled? Appealed? Still Pending?)

6. Date lawsuit was filed: _____

7. Date of disposition (if concluded): _____

C. Do you have any other lawsuit(s) pending in the federal court in South Carolina?

Yes _____ No X

II. PARTIES

In Item A below, place your name and address in the space provided. [If additional plaintiffs, do the same on another sheet of paper.]

A. Name of Plaintiff: Loretta Laura Erby

Address: 1030 Abney Hill Rd., Blythewood, SC 29016

In Item B below, place the full name of the defendant, and his/her/its address, in the space provided. Use Item C for additional defendants, if any.

B. Name of Defendant: Webster University

Address: 8911 Farrow Rd, Ste 101, Columbia, SC 29203

C. Additional Defendants (provide the same information for each defendant as listed in Item B above):

Betsy Schmutz, Human Resources AVP

470 E. Lockwood Ave, St. Louis, MO 63119, Loretto Hall 32

Beth Russell, AVP for Extended Campuses/Academic Affairs

470 E. Lockwood Ave, St. Louis MO 63119, Loretto Hall 151

David Dunlap, SC Regional Director

5300 International Blvd., North Charleston, SC 29418

Sam Cooper, SC Regional Academic Director

124 Verdade Blvd, Suite 400, Greenville, SC 29607

III. STATEMENT OF CLAIM

State here, as briefly as possible, the facts of your case. Describe how each defendant is involved.

Include also the name(s) of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheets of paper if necessary.

1. In this action Plaintiff Loretta L. Erby alleges that Webster University violated my civil rights under Title VII. While on FMLA I was demoted and then terminated within two weeks after returning from FMLA due to severe depression.
2. ON November 02, 2012, plaintiff Loretta Erby filed for unemployment & was notified that my claim needed to be investigated. A document was submit to the unemployment office to prove Benefit entitlements. (see ^{Attachment 7} cover pg.) &c 2/28/13
3. ON September 17, 2012, plaintiff was enrolled as a full-time student at Webster University. When terminated plaintiff was locked out of student account and unable to complete course. This incident lead to filing a complaint with the Department of Education office of Civil Rights (Attachment 2)
4. ON September 17, 2012, regarding my termination and incidents from 8/24/12- 9/17/2012, which lead to termination. Including a response from Craig Mundle, Internal Investigations. (Attachment 3)
5. ON September, 17, 2012, I was called into the office of Sam Cooper and handed a written reprimand. He stated he was present, but did not see me kick LaShaunda, but a student called ST. Louis. When I asked for the student statement or name I was denied. Thirty five minutes later I was called into the office of Sam Cooper and terminated because LaShaunda was fearful of me and insubordination. (Attachment 4)

III. STATEMENT OF CLAIM - continued.

6. On September 12, 2012, I filed a corporate ethics Complaint against Sam Cooper, David Dunlap, Beth Russell Concerning discrimination/harassment. (Attachment 5)

7. On January 4, 2012, My job description list management responsibilities, but I was informed by Dr. David Dunlap, that I was hired without approval from St. Louis. When I provided documentation and emails with proof, Dr. Dunlap became hostile. (Attachment 6)

8. On May 17, 2012, I filed a charge of discrimination with EEOC on the basis of race, sexual harassment, and retaliation against Webster University (Attachment 7B)

I was granted a Notice of Suit Rights on 11-29-2012, which I received in the mail on 12-1-2012. (Attachment 7A)

9. On April 18, 2012 I filed a formal grievance complaint with Betsy Schmutz, After an extensive conversation with Julian Schuster, Provost. Dr. Schuster informed me that Dunlap should not bother me again & if he does to contact him. I followed procedure & Webster failed to follow their own procedures. (Attachment 8)

10. On April 14, 2012 Sent Letter of Academic Issues (Attachment 9)

On March 22, 2012 Sent Internal Grievance to Betsy Schmutz (Attachment 10)

On September 12, 2012 Demote to Department Assistant (Attachment 11)

IV. RELIEF.

State briefly and exactly what you want this court to do for you.

The plaintiff, Loretta Erby, is seeking \$300,000.00 for wrongful termination, Discrimination, Sexual harassment, Sexual harassment Hostile Environment, Defamation, Retaliation, Mental distress, and emotional harm.

Relief is being sought from this Court, because of the actions described in this statement. In addition, I was diagnosed and treated for severe depression; before my physician placed me on FMLA. While on FMLA I was demoted from a manager to a department assistant.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 28 day of February, 20 13.


Signature of Plaintiff